

PREFACE

This Handbook is provided by the Clerk of Council for the City of Cincinnati.

This Handbook provides informational guidance to those persons interested in the Lobbying Laws of the City of Cincinnati. Questions regarding this publication or the Lobbying Laws in general should be directed to the Clerk of Council at 513-352-3248.

June, 1997 Edition

GENERAL INFORMATION

The following is an informational guide to Chapter 112 of the Cincinnati Municipal Code. Please consult the Cincinnati Municipal Code for further information, and address any questions you may have to the Clerk of Council.

In the broadest sense of the term, "to lobby" is to attempt to influence a councilmember, appointee of the Council, the City Manager, the director of any department listed in the Charter or Administrative Code of the City, or any member of the staff of any public officer or City employee decision maker. A citizen's voluntary opinion regarding a measure under consideration by a councilmember can be considered "lobbying." However, such ordinary activities of citizens who exercise their constitutional right to petition the government or individual members of the government on any matter are separate and distinct from "professional" lobbying, so long as such activities are exclusively the exercise of individual liberty.

A professional lobbyist, also known as a legislative agent or lobbyist, is a person who receives compensation for his or her efforts to influence councilmembers or other city decision makers on behalf of a client or employer. This is a guide for the "professional lobbyist."

These lobbying laws apply only to attempts to influence City of Cincinnati decision makers on the *municipal* level; the law does not apply to activities involving attempts to influence the decisions of county or state officials.

WHAT AGENCY IS RESPONSIBLE FOR ADMINISTERING THE LOBBYING LAWS IN THE CITY OF CINCINNATI?

The Clerk of Council administers the lobbying disclosure law.

WHAT IS THE LOBBYING DISCLOSURE LAW?

The lobbying disclosure law consists of a general requirement that people, organizations or other groups who expend funds or receive compensation to influence legislative or administrative action of the City must register with the Clerk of Council of the City. The purpose of the law is to allow the public to know which persons or entities are making a significant effort to influence public policy. The provisions of the law can be found in Chapter 112 of the Cincinnati Municipal Code.

WHO SHOULD REGISTER AS A LEGISLATIVE AGENT OR EMPLOYER

GENERALLY

Whether a person should register as a legislative agent is determined by the person's activity. A legislative agent is any individual who is engaged by an employer during at least a portion of his or her time, as one of his or her main purposes, to promote, advocate, or oppose the passage, modification, defeat, or executive approval or veto of any legislation by direct communication. If the advocacy by direct communication regarding legislation is directed to any councilmember, appointee of the Council, the City Manager, the director of any department created in the Administrative Code, or the staff of any such public official and the person is attempting to influence legislation, then the person engaged in such advocacy is a legislative agent.

The question that often arises is what does the phrase "during at least a portion of his or her time, as one of his or her main purposes" mean. In other words, at what point have you performed sufficient activity to warrant registration as a legislative agent? As a rule of thumb, if you have made direct contact at least three times for the purpose of influencing legislation during a calendar year, you should be registered as a legislative agent.

Only *individuals* can be legislative agents, a company, consulting firm, or a law firm cannot be engaged as a legislative agent. Below are the statutory definitions found in C.M.C. 112-1 *et seq.*

WHO IS A LEGISLATIVE AGENT?

A **legislative agent** is any individual who is **engaged** during at least a portion of his or her time to **actively advocate** as one of his or her main purposes.

Engaged means to make any arrangement, and "engagement" means any arrangement, whereby an individual is employed or retained for **compensation** to act for or on behalf of an employer to actively advocate.

Compensation means a salary, gift, payment, benefit, subscription, loan, advance, reimbursement, or deposit of money or anything of value; or a contract, promise, or agreement, whether or not legally enforceable, to make compensation.

Actively advocate means to promote, advocate, or oppose the passage, modification, defeat, or executive approval or veto of any **legislation** by direct communication with any member of the Council, appointee of the Council, the City Manager, the director of any department listed in the Administrative Code, or any member of the **staff or employee of such public official**. **Actively advocate does not include the action of any person not engaged by an employer who has a direct interest in legislation if the person, acting under Section 3 of Article I, Ohio**

Constitution, assembles together with other persons to consult for their common good, instructs a public officer or employee who is listed in this division, or petitions that public officer or employee for the redress of grievances.

Legislation means ordinances, resolutions, amendments, nominations, and any other matter pending before the Council.

Staff means any city employee whose official duties are to formulate policy and who exercises administrative or supervisory authority or who authorizes the expenditure of city funds. "Staff" is limited to employees who are required to file a financial disclosure statement under Article XXVI of the Administrative Code.

WHAT IS AN EMPLOYER OF A LEGISLATIVE AGENT?

An **employer** means any **person** who, directly or indirectly, engages a legislative agent.

Person means any individual, partnership, trust, estate, business trust, association, or corporation; any labor organization or manufacturer association; any department, commission, board, publicly supported college or university, division, institution, bureau, or other instrumentality of the state; or any county, township, municipal corporation, school district, or other political subdivision of the state.

Employer *does not include* any person: (1) who is a member of a business, trade, professional, civic or other membership organization which employs a legislative agent; **and** (2) who does not directly employ a legislative agent.

WHO IS EXEMPT FROM REGISTERING?

The legislative lobbying laws do not apply to the efforts of persons or entities who are actively advocating in any of the following circumstances:

- (1) Appearances before meetings of the committees of the Council or the full Council, and appearances before public hearings of the committees of the Council;
- (2) News, editorial, and advertising statements published in bona fide newspapers, journals, or magazines, or broadcast over radio or television;
- (3) The gathering and furnishing of information and news by bona fide reporters, correspondents, or news bureaus to news media described in number two above;
- (4) Publications primarily designed for and distributed to members of bona fide associations or charitable or fraternal nonprofit

corporations.

Also excepted from the lobbying laws are professional services in drafting ordinances or resolutions, preparing arguments thereon, or in advising clients and rendering opinions as to the construction and the effect of proposed or pending legislation, if the services are not otherwise connected with actions to actively advocate.

INITIAL REGISTRATION STATEMENTS

GENERALLY

Each legislative agent and employer must file an ***Initial Registration Statement*** which is a joint registration for each legislative agent engaged by an employer. Legislative agents engaged by more than one employer must file separate Initial Registration Statements for each engagement, i.e., for each employer. Similarly, each employer must file an Initial Registration Statement for each legislative agent engaged or employed. For example, if an employer engages four legislative agents, four separate Initial Registration Statements must be filed representing the four engagements.

WHEN SHOULD YOU REGISTER?

Each legislative agent and employer is required to file an Initial Registration Statement within **10** days of the engagement of the legislative agent. Initial Registration Statement forms are available from the Clerk of Council.

WHERE DO YOU REGISTER?

The Initial Registration Statement is filed with the Clerk of Council. The Initial Registration Statement may be mailed to the Clerk of Council, 801 Plum Street, Room 308, Cincinnati, Ohio 45202 or may be filed personally.

WHAT IS THE REGISTRATION FEE?

There is a \$25 registration fee for each Initial Registration Statement filed. The payment must be by check or money order only, made payable to Clerk of Council. An Initial Registration Statement will not be accepted without the fee.

HOW LONG IS THE REGISTRATION VALID?

Following registration, the legislative agent will be issued a card by the Clerk of Council showing that the legislative agent and the employer are

registered. The registration card and registration are valid from the date of its issuance until the next thirtieth day of November of an odd-numbered year. In other words, all registrations expire at the end of each two-year session of the Council. Upon expiration, you are no longer registered as a legislative agent and employer, you **must** file a **new** Initial Registration Statement for the next two-year period.

WHAT INFORMATION IS REQUIRED ON THE INITIAL REGISTRATION STATEMENT?

Each Initial Registration Statement is required to contain the following information:

1. The name, business address, and occupation of the legislative agent;
2. The name and business address of the employer on whose behalf the legislative agent is actively advocating.
 - a. If the employer is a trade association or other charitable or fraternal organization that is exempt from federal income taxation under subsection 501(c) of the federal Internal Revenue Code, the statement need not list the names and addresses of each member of the association or organization, so long as the association or organization itself is listed;
3. A brief description of the type of legislation to which the engagement relates.

Any changes in the information provided on the Initial Registration Statement are required to be indicated on the next Updated Registration Statement filed by the agent or employer.

WHO SHOULD BE REGISTERED AS THE EMPLOYER?

The person or entity on whose behalf you will be actively advocating is required to be listed as the employer. As noted above, an employer is a person who "directly or ***indirectly***" engages a legislative agent. Therefore, by definition, if a client is paying someone to advocate on their behalf, even though not paying the legislative agent directly, the client is *indirectly* engaging the legislative agent and should therefore be listed as the employer.

UPDATED REGISTRATION STATEMENTS

GENERALLY

Once registered, legislative agents and employers are each required to file an **Updated Registration Statement** two times a year. Updated Registration Statements are due July 31 for the reporting period January 1 through June 30; and January 31 for the reporting period July 1 through December 31. A legislative agent is required to file only one Updated Registration Statement for each of the two reporting periods. The single Updated Registration Statement contains information for each of the agent's employers. An employer is required to file only one Updated Registration Statement for all of its agents for each of the two reporting periods. Each agent and employer is responsible for the filing of their respective form.

An Updated Registration Statement has three types of information:

1. **Confirmation** of the continuing existence of each engagement described in the Initial Registration Statement;
2. A **list of the specific ordinances** or resolutions on which the agent actively advocated under that engagement during the period covered by the Updated Registration Statement;
3. Details of any **financial transactions**.

The following pages explain in detail the individual reporting requirements for the legislative agent and the employer of the legislative agent. Specifically, the above three areas will be discussed - confirmation, ordinances, and financial transactions. For ease of understanding, the following explanations for the legislative agent will be with regard to a single engagement; if you have more than one engagement, each of the following requirements must be met with respect to each of your engagements.

LEGISLATIVE AGENT UPDATED REGISTRATION STATEMENTS

CONFIRMATION OF ENGAGEMENT

The Updated Registration Statement asks the legislative agent whether the agent continues to represent the employer for which the Updated Registration Statement is being completed. If you have answered the question "No," you must state the date of the termination.

If the date of termination falls within a reporting period, even one day, you are required to file an Updated Registration Statement for that reporting period. If you terminate an engagement at the beginning or in the middle of a reporting period, you may file your Updated Registration Statement at the time of termination, you are not required to wait until the end of the reporting period. It is suggested that this method is followed to insure the filing of the Updated Registration Statement is not forgotten.

LIST OF SPECIFIC ORDINANCES

The Updated Registration Statement requires you to list the specific ordinance(s) and resolution(s), by number, on which you actively advocated for this employer during the reporting period. Related to this is the requirement that you must give a brief description of each additional type of legislation to which the engagement relates, i.e., health care or insurance. If you have been actively advocating in an area different from or in addition to the types originally listed on your Initial Registration Statement, you must list each additional type for that employer.

EMPLOYER UPDATED REGISTRATION STATEMENTS

CONFIRMATION OF ENGAGEMENT

Each Updated Registration Statement asks the employer whether the agent continues to represent the employer for which the Updated Registration Statement is being completed. If you have answered the question "No," you must state the date of the termination.

If the date of termination falls within a reporting period, even one day, you are required to file an Updated Registration Statement for that reporting period. If you terminate an engagement at the beginning or in the middle of a reporting period, you may file your Updated Registration Statement at the time of termination, you are not required to wait until the end of the reporting period. It is suggested that this method is followed to insure the filing of the Updated Registration Statement is not forgotten.

LIST OF SPECIFIC ORDINANCES

Each Updated Registration Statement asks the employer to list the specific ordinance(s) and resolution(s), by number, on which the employer actively advocated during that reporting period.

CAMPAIGN CONTRIBUTIONS

You are not required to report campaign contributions made to a public official on your Updated Registration Statement, and a member of the Council is not prohibited from soliciting or accepting a campaign contribution, if the contribution is reported in a campaign finance report under Chapter 117, Cincinnati Municipal Code.

FINANCIAL TRANSACTIONS

WHO MUST FILE?

Also included in the Updated Registration Statement is a ***Financial Transaction Statement***. *Financial transaction* means a transaction or activity that is conducted or undertaken for profit and arises from the joint ownership or the ownership or part ownership in common of any real or personal property or any commercial or business enterprise of whatever form or nature between the following:

- (1) A legislative agent, his employer, or a member of the ***immediate family*** of the legislative agent or his employer; and
- (2) Any member of the Council, appointee of the Council, the director of a department created under the Administrative Code, or any member of the staff of a public officer or employee.

Immediate family means a spouse residing in the person's household and any dependent child.

"Financial transaction" does not include any transaction or activity if it is available to the general public on the same terms, or if it is an offer or sale of securities to any member of the Council, appointee of the Council, the City Manager, the director of a department created under the Administrative Code, any member of the staff of a public officer or employee that is governed by regulation D, 17 C.F.R. 2301.501 [2301.50.1] to 2301.508 [2301.50.8], adopted under the authority of the "Securities Act of 1933," 48 Stat. 74, 15 U.S.C.A. and following, or that is governed by a comparable provision under state law.

WHAT MUST BE FILED?

Any legislative agent or employer who has had any financial transaction with or for the benefit of any member of the Council, appointee of the Council, the City Manager, the director of a department created under the Administrative Code, or any member of the staff of one of these public officers or employees shall describe the details of the transaction. Each transaction listed must include:

1. The name of the public officer or employee;
2. The purpose and nature of the transaction; and

3. The date it was made or entered into.

An employer or legislative agent who is required to file a statement describing a financial transaction under this section shall deliver a photo copy of the actual statement to the public officer or employee with whom or for whose benefit the transaction was made at least 10 days before the date on which the statement is filed.

No employer shall be required to file any statement or to deliver a copy of the statement to a public officer or employee with whom or for whose benefit the transaction was made if the financial transaction to which the statement pertains is reported by a legislative agent engaged by the employer.

REVIEW OF STATEMENTS

GENERALLY

Both the Initial Registration Statement and Updated Registration Statements are reviewed by the Clerk of Council for accuracy and completeness.

FAILURE TO REGISTER OR FILE AN UPDATED REGISTRATION STATEMENT

If it is determined that a legislative agent or employer has failed to file either an Initial Registration Statement or an Updated Registration Statement, the Clerk of Council will send written notification by certified mail to the person or entity who failed to file the Statement regarding such failure. Any person or entity so notified shall, within 15 days after receiving the notice, file an Initial Registration Statement or Updated Registration Statement as the case may be. Failure to file the requested Statement within the 15 days may result in the referral of the matter to the appropriate prosecuting authority. If such a referral is made, the Clerk of Council will also notify the City Manager and each member of the Council of the referral.

FAILURE TO PROPERLY DISCLOSE

After an Updated Registration Statement is filed, the Clerk of Council reviews each Statement to determine whether the Statement contains all of the required information. If it is determined a Statement is deficient, the Clerk of Council will send written notification by certified mail to the person or entity who filed the Statement regarding the deficiency. Any person or entity so notified shall, within 15 days after receiving the notice, file an amended Statement that contains all of the required information. Failure to file the requested amended Statement within the 15 days will result in the referral of the matter to the appropriate prosecuting authority. If such a referral is made, the Clerk of Council

will also notify the City Manager and each member of the Council of the referral.

It is important to note that compliance with a "15 day letter" does not necessarily cure any deficiencies. A determination will be made on a case by case basis as to whether a referral should be made to the appropriate prosecuting authority notwithstanding the amendment.

In addition to the powers of the Clerk of Council, the Office of Contract Compliance and Municipal Investigations (OCCI) may investigate compliance with sections 112-01 to 112-17 of the Municipal Code and with section 2921.13 of the Revised Code in connection with statements required to be filed under these sections, and in the event of an apparent violation, shall report its findings to the City Prosecutor who shall institute proceedings as are appropriate.

DISPUTED INFORMATION

If a dispute arises between any member of the Council, appointee of the Council, the City Manager, the director of any department created in the charter or in the Administrative Code or any member of the staff or employee of such public official and an employer or legislative agent with respect to any statement required to be filed under section 112-1 - 112-17 of the Municipal Code, the member or employee, employer, or legislative agent may file a complaint with the OCCI. The OCCI shall proceed to investigate the complaint.

The complaint shall be filed at least three days prior to the time the statement is required to be filed with the Clerk of Council. The time for filing a disputed shall be extended pending the final decision of the OCCI. This extension does not extend the time for filing the non-disputed portions of the statement. The OCCI shall notify the parties of its final decision by certified mail. If the OCCI decides that the disputed expenditure or financial transaction should be reported, the employer or legislative agent shall include the matter in an amended statement and file the amended statement not later than ten days after the employer or agent receives notice of the decision of the OCCI by certified mail.

TERMINATION OF ENGAGEMENT

A legislative agent is required to notify the Clerk of Council within 30 days after the termination of an engagement. The form, entitled "Termination Notice" should be attached to the agent's last Updated Registration Statement. If the engagement exists for even one day into a reporting period, the agent and employer must file an Updated Registration Statement for that period. The agent and employer may file their respective Updated Registration Statements at the time of termination if the agent has only one employer or the employer has only one agent. Otherwise, the agent or employer must wait until the end of the reporting period.

PROHIBITIONS AND PUBLIC INSPECTION

PROHIBITIONS

There are criminal penalties for non-compliance with the registration, record keeping, and updating requirements. Knowingly failing to file an Initial Registration Statement, maintain a record, or file an Updated Registration Statement is a misdemeanor of the fourth degree punishable by up to 30 days incarceration and a \$250 fine. For an organization it is a fine of \$2,000. Knowingly falsifying an Initial Registration Statement or an Updated Registration Statement is a misdemeanor of the first degree punishable by up to 6 months in jail and a \$1000 fine. For an organization, it is a fine of \$5,000. The Clerk of Council or OCCI will refer alleged violations to the appropriate prosecuting authority.

PUBLIC INSPECTION OF STATEMENTS

All Initial Registration Statements and Updated Registration Statements are public records and open to public inspection. Anyone may review all of the Statements and may request copies. Copies are 15¢ a piece, payable by check, cash, or money order.

FALSE STATEMENTS CONTINGENT FEES AND CAMPAIGN CONTRIBUTIONS

FALSE STATEMENTS

An employer or legislative agent who files any false statement is liable in a civil action to any public officer or employee who sustains damage as a result of the filing or publication of the statement.

CONTINGENT FEES

No person shall engage any person to actively advocate in exchange for compensation that is contingent in any way upon the passage, modification, or defeat of any legislation. No person shall accept any engagement to actively advocate in exchange for compensation that is contingent in any way upon the passage, modification, or defeat of any legislation.

CAMPAIGN CONTRIBUTIONS

Nothing in sections 112-01-112-17 of the Municipal Code shall require the reporting of, or prohibit a member of the Council from soliciting or accepting, a contribution from or expenditure by any person if the contribution or expenditure is reported in accordance with Chapter 117 of the Municipal Code.

Clerk of Council

801 Plum Street, Room 308
Cincinnati, Ohio 45202
(513) 352-3246

\$25.00 FILING FEE**LEGISLATIVE AGENT/EMPLOYER INITIAL REGISTRATION STATEMENT**

This statement must be filed with the Clerk of Council within ten (10) days of engagement. Please read instructions and review Section 112-5 prior to filing. There is a \$25.00 fee for this filing. *Check or money order only made payable to "Clerk of Council"*. Upon termination of this engagement, there is an affirmative duty to notify the Clerk of Council within thirty (30) days the form may be obtained from Clerk. **ANY PERSON WHO KNOWINGLY FILES A FALSE STATEMENT IS GUILTY OF FALSIFICATION UNDER SECTION 2921.13 OF THE OHIO REVISED CODE, WHICH IS A MISDEMEANOR OF THE FIRST DEGREE.**

A. LEGISLATIVE AGENT INFORMATION

1. Full Name _____
2. Occupation _____
3. Title/Position _____
4. Business Address _____

City State Zip(+4)

Street Suite Number
5. Telephone Number (_____) _____
6. Date of Engagement as Legislative Agent _____

B. EMPLOYER INFORMATION

1. Full name of company or organization _____
2. Type of Industry _____
3. Business Address _____

City State Zip(+4)

Street Suite Number

C. BRIEF DESCRIPTION OF THE TYPE OF LEGISLATION TO WHICH LEGISLATIVE AGENT'S ENGAGEMENT RELATES.

D. CATEGORICAL LISTING OF PRINCIPAL BUSINESS OR ACTIVITY OF EMPLOYER. PLEASE CHECK ALL THAT ARE APPLICABLE.

<input type="checkbox"/> Agriculture	<input type="checkbox"/> Environment	<input type="checkbox"/> Real Estate/Housing
<input type="checkbox"/> Alcohol/Tobacco	<input type="checkbox"/> Financial Institutions/Consumer Finance	<input type="checkbox"/> Retail and Commercial
<input type="checkbox"/> Arts/Entertainment	<input type="checkbox"/> Medical/Hospitals/Health Care	<input type="checkbox"/> Service Business
<input type="checkbox"/> Communications/Media	<input type="checkbox"/> Insurance	<input type="checkbox"/> Social Svs./Human Svs.
<input type="checkbox"/> Contractors/Construction	<input type="checkbox"/> Labor/Labor Organizations	<input type="checkbox"/> Science and Technology
<input type="checkbox"/> County/Local Government	<input type="checkbox"/> Legal	<input type="checkbox"/> State Employees
<input type="checkbox"/> Education	<input type="checkbox"/> Manufacturer	<input type="checkbox"/> State Government
<input type="checkbox"/> Energy/Utilities	<input type="checkbox"/> Public Interest	<input type="checkbox"/> Transportation

CERTIFICATION: THE UNDERSIGNED HEREBY CERTIFY THAT ALL REASONABLE EFFORTS AND DUE DILIGENCE HAVE BEEN UNDERTAKEN IN THE PREPARATION AND COMPLETION OF THIS STATEMENT AND THAT THE CONTENTS ARE TRUE AND ACCURATE TO THE BEST OF HIS OR HER KNOWLEDGE.

ALL SIGNATURES MUST BE ORIGINAL AND SIGNED PERSONALLY BY THE NAMED INDIVIDUAL.

Type or Print Name of Legislative Agent

Signature of Legislative Agent

Date

Type or Print Name of Persons Signing for Employer

BY:

Signature for Employer

Title

Date

Clerk of Council

801 Plum Street, Room 308
Cincinnati, Ohio 45202
(513) 352-3246

Please check ALL that apply

☐ Termination(s) of Engagement
☐ Change of Address
☐ Amended Statement

LEGISLATIVE AGENT UPDATED REGISTRATION STATEMENT

This statement must be filed with the Clerk of Council by the last day of January and July, annually. Please read instructions and review Sections 112-1 to 112-17, Cincinnati Municipal Code, prior to filing. **There is no fee for this filing.** Upon termination of this engagement, there is an affirmative duty to notify the Clerk of Council within thirty (30) days (the form may be obtained from the Clerk.) **ANY PERSON WHO KNOWINGLY FILES A FALSE STATEMENT IS GUILTY OF FALSIFICATION UNDER SECTION 2921.13 OF THE OHIO REVISED CODE, WHICH IS A MISDEMEANOR OF THE FIRST DEGREE.** Other related prohibitions and penalties are contained in Section 112-99 of the Cincinnati Municipal Code.

A. GENERAL INFORMATION

Full Name of Legislative Agent _____
(First) (Middle) (Last)

Occupation _____

Business Address _____
Street Suite Number

City State Zip(+4)

Telephone Number (_____) _____

AGENT CHANGE OF NAME OR ADDRESS - Based on your initial Registration Statement or last Updated Registration Statement, state any changes in your name or address.

(If none, check here _____)

Name of Legislative Agent _____

Address _____
Street Suite Number

City State Zip(+4)

Telephone Number (_____) _____

Reporting Period: Statement filed for period covering (check one and fill in year).

____ January 1 through June 30, 199__ (Report due on or before July 31)

____ July 1 through December 31, 199__ (Report due on or before Jan. 31)

B. AMENDMENTS, TERMINATIONS, AND TYPES OF LEGISLATION

AMENDED STATEMENT - Is this an Amended Statement (i.e., any change in an amount or a filing pursuant to a dispute resolution decision of the OCCl.

_____ YES _____ NO

If yes, you are required to complete only the portion(s) you have amended.

TERMINATIONS - Are you still engaged by all of the employers listed on page 1 of this form?

_____ YES _____ NO

If no, please list the name of the Employers by whom you are no longer engaged and the date of termination. (Attach additional sheets if necessary.)

Employer Name

Date of Termination

_____	_____
_____	_____
_____	_____
_____	_____

ORDINANCES AND RESOLUTIONS - List the specific ordinance(s) and resolution(s) on which you actively advocated during this reporting period.

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

ADDITIONAL TYPES OF LEGISLATION - Since your Initial Registration Statement or last Updated Registration Statement for all Employers listed on this form, give a brief description of each of the additional types of legislation to which any of your engagements relate.

(If none, check here _____)

C. DEFINITIONS

"**Staff**" means any city employee whose official duties are to formulate policy and who exercises administrative or supervisory authority or who authorizes the expenditure of city funds. "Staff" is limited to employees who are required to file a Financial Disclosure Statement under Article XXVI of the Administrative Code.

"**Legislation**" means ordinances, resolutions, amendments, nominations, and any other matter pending before the Council. See the definition of "legislation" under Section 112-1-L, Cincinnati Municipal Code.

"**Financial Transaction**" See definition in Section 112-1-F, Cincinnati Municipal Code.

D. FINANCIAL TRANSACTIONS

If the Legislative Agent, or a member of his or her immediate family had, during this reporting period, a financial transaction* (which is not being disputed under Section 112-19, Cincinnati Municipal Code,) with or for the benefit of a member of the Council, appointee of the Council, City Manager, the Director of a department created under the Administrative Code, or any member of the staff* of such public officer or employee, then the following information is required with respect to each such financial transaction:

a. Name of the public officer, employee, or staff member:_____

b. Brief description of the purpose and nature of the transaction:_____

c. Date the transaction was made or entered into:_____

d. Other pertinent details:_____

(Attach an additional sheet for each public officer, employee, or staff member.)

(If none, check here_____)

NOTE: If the Legislative Agent is required to disclose a financial transaction described in this Paragraph F, then the Legislative Agent shall deliver a copy of such paragraph which contains such information to the public officer(s) of employee(s) identified therein, at least ten (10) days before this form is filed with the Clerk of Council.

If the foregoing provision is applicable, indicate the date that such information was delivered:

CERTIFICATION: THE UNDERSIGNED HEREBY CERTIFIES THAT ALL REASONABLE EFFORTS AND DUE DILIGENCE HAVE BEEN UNDERTAKEN IN THE PREPARATION AND COMPLETION OF THIS STATEMENT AND THAT THE CONTENTS ARE TRUE AND ACCURATE TO THE BEST OF HIS OR HER KNOWLEDGE.

ALL SIGNATURES MUST BE ORIGINAL AND SIGNED PERSONALLY BY THE NAMED INDIVIDUAL.

_____	_____	_____
Type or Print Name of Legislative Agent	Signature of Legislative Agent	Date